

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V**

DATE: October 6, 2000

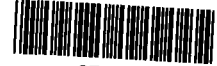
SUBJECT: Work Plan Approval for North Bronson, Bronson, Michigan, Remedial Design Oversight
RAC - Roy F. Weston, Inc. Name, Work Assignment Number 031-ROBE-051C

FROM: Rosita Clarke-Moreno
Work Assignment Manager

THRU: Pat Vogtman
Project Officer

TO: Claudea Heise
Contract Specialist

EPA Region 5 Records Ctr.



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The contractor originally submitted a Remedial Design Oversight work plan on June 23, 1999. When the work assignment was initiated, the Agency was expecting a signed ~~Record of Decision~~ within a matter of a few weeks at most. Subsequently, EPA identified North Bronson as one of the sites whose analytical data may have been compromised because of Agency issues with the Central Regional Laboratory (CRL) Program. Until the problems with the CRL could be reconciled, the Department of Justice could not enter the Consent Decree which triggers the start of the Remedial Design. The Consent Decree was finally entered into February 2000 and the PRP's began the preparation of their planning documents, e.g. work plan, Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), etc. When EPA initially completed its original IGCE and the contractor initially submitted its cost proposal, both entities knew little of the specifics of the proposed Pre-Design Studies field work. Now that the PRP's have submitted their work plan, EPA and Weston are in a much better position of estimating the level of support needed. Consequently, U.S. EPA issued an amended Statement of Work on September 11, 2000, and amended the IGCE accordingly. Weston submitted an amended work plan on September 28, 2000. I reviewed the work plan and find that 1) the work plan tasks are within the existing SOW and reflect what was discussed in the kickoff meeting, 2) the work described in the work plan is technically appropriate and 3) the costs appear to be fair and reasonable for the LOE planned. No negotiation meeting is necessary as I am recommending that the work plan be approved as submitted. c1

Based on the amended SOW dated September 5, 2000, the contractor proposed 2,101.5 LOE at a total cost of \$ 173,515. The Agency proposed a range of 2,011 to 2,721 LOE and \$175,908 to \$237,993. Based upon a review by the agency, EPA did not have any comments on the work plan. A task by task comparison is as follows:

Independent Government Cost Estimate (IGCE) - Contractor Work Plan Comparison					
Task Description	IGCE LOE		Contractor's WP LOE 6/19/99	Contractor's WP LOE 9/28/00	Recommend ed LOE
	Minimum	Maximum			
1 - Project Planning & Support	534.0	722.0	635.0	421.5	421.5
2 - Community Relations Technical Support	27.0	37.0	44.0	34.0	34.0
3 - Data Acquisition/RD Oversight	529.0	715.0	1379.0	586.0	586.0
7 - Review PRP Pre-sign Documents	797.0	1079.0	1098.0	896.0	896.0

9 - Technical Meeting Support	88.0	120.0	128.0	128.0	128.0
10 Closeout Work Assignment	36.0	48.0	36.0	36.0	36.0
Total	2011.0	2721.0	3320.0	2101.5	2101.5

The following tasks are within EPA's range and are recommended for approval:

2 - Community Relations Technical

3 - Data Acquisition/RD Oversight

7 - Review PRP Pre-sign Documents

9 - Technical Meeting Support

10 - WA Closeout

The following task was outside the range of EPA's IGCE:

1- Project Planning. The IGCE estimated a range of 534 to 722 LOE for this task. The contractor proposed 421.5 LOE in its September 28, 2000 work plan. When the work assignment was initiated, Weston was authorized to initiate Task 1 - Project Planning. Therefore, when Weston prepared the September 28, 2000 work plan, the contractor was able to enter actual LOE for some of the subtasks. For example, under subtask 1.1.3 - Evaluate Existing Information, EPA estimated 76 LOE. Weston entered its incurred to date for a total of 3 LOE.. Under subtask 1.1.5 - Review PRPs Plans, EPA estimated 145 LOE. Weston annotated its incurred to date for a total of 56.5 LOE and an additional 10 LOE for its estimate to complete for a total of 66.5 LOE. Since Weston has completed these activities, I defer to Weston's numbers and recommend that Weston's lower estimate of 421.5 LOE for Project Planning be approved.

General Issues

I have also reviewed the contractor's proposed travel and other direct costs associated with this work assignment. EPA's ODCs are calculated @ 8% of Direct Labor. Weston's estimate is based on actual estimates for materials and supplies, telephone, mail, and miscellaneous. Weston's estimate is reasonable as there is no sampling which typically increases the ODC costs. The contractor's travel estimate is accepted as reasonable. Lastly, the professional level distribution of contractor personnel is appropriate for the work planned.

Category	EPA Estimate Min	EPA Estimate Max	Weston's Estimate
Travel	\$6,154	\$8,326	\$6,904
ODCs	\$4,649	\$6,290	\$1,882

	P4	P3	P2	P1	Total
U.S. EPA	24.0%	30.0%	32.0%	14.0%	100%
Weston	7.8.0%	40.6%	50.1%	1.3%	100%